

HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,

Plaintiffs,

v.

CITY OF SEATTLE,

Defendant.

No. 20-cv-00983

**DECLARATION OF KATE HUTTON**

I, Kathleen Hutton, declare as follows:

1. I am over the age of eighteen, competent to testify, and have personal knowledge of the facts set forth herein.

2. I am employed by the City of Seattle in the Office of Emergency Management as a Communications Coordinator. In that role, I have experience working with the City's Alert Seattle system.

3. Alert Seattle is the City's official emergency alert system. The City uses this system to send alerts both externally, to the public, and internally.

4. Alert Seattle is operated by an outside vendor named Rave Mobile Communications. All text messages from Alert Seattle are sent using a five or six-digit number, which include: 226787, 67283, 78015, 77295, and 22911. The City does not designate a given short code for an alert message; the Rave system can send an alert from any of these short codes.

DECLARATION OF KATHLEEN HUTTON - 1  
(Case No. 20-cv-00983)

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6. At the request of counsel for the City, I collected information from the Rave database for Alert Seattle. The database does not have a list of all messages received by a specified user. It does maintain historical data regarding messages sent and the distribution groups that received them.

7. I collected all available messages and provided this data to counsel on August 15, 2022. The spreadsheet included information including the date and time it was sent, the distribution groups that received it, the number of users that received it by text, and the content of the text alert.

8. The distribution lists included SPD Group 1 and SPD's Special Command Staff Group.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

SIGNED at Seattle, Washington, this 27 day of October 2022.

  
Kate Hutton